

JAN 29 2020

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

I, James J. Jenkins, a Special Agent with the U.S. Department of State, Diplomatic Security Service in Baltimore, Maryland, being duly sworn, depose and state as follows:

**I. INTRODUCTION**

1. This affidavit is submitted in support of a criminal complaint charging **Adewumi ABIOYE ("ABIOYE")** with conspiracy to commit wire fraud, in violation of 18 U.S.C. Section 1349. As set forth below, your affiant has probable cause to believe that **ABIOYE** conspired with others known and unknown: (1) to open bank accounts using fake identities and recently formed limited liability companies ("LLCs"); (2) to use bank accounts to receive money obtained via fraud; and (3) to withdraw and move funds obtained by fraud.

2. The conspiracy operated from at least January 2019 to present. Law enforcement has determined that multiple individuals opened numerous bank accounts using either a fake name or a recently formed LLC, which had a fake person listed as a registered agent or authorized member. Many of the accounts were opened using fraudulent United Kingdom passports. After the bank accounts were opened, the bank accounts were funded via checks, wires, and/or ACH transfers – many of which were the result of misrepresentations to the victims. As discussed in greater detail herein, your affiant and other agents have confirmed that the transfers were fraudulent through interviews, bank records and/or reports to the government.

3. The Department of State Diplomatic Security Service ("DSS") and Homeland Security Investigations ("HSI") in Baltimore, MD have been working on this investigation since the summer of 2019. Your affiant and other federal agents have obtained information from subpoenas, government records, search warrants, a consent search, interviews, surveillance, and other investigative means.

*[Signature]*

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*[Signature]*

*[Circular Stamp]*

4. The facts set forth in this affidavit are known to me as a result of my participation in this investigation, from information provided to me by other law enforcement officers and government officials, and from records, documents, and other evidence obtained during this investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included each and every fact known to me concerning this investigation, but rather those facts that I believe are necessary to establish probable cause that **ABIOYE** committed the crime referenced above. References to dates, times, places, and amounts are intended to be approximate. Everything set forth in this Affidavit is true to the best of my knowledge and belief.

5. I am a Special Agent with the U.S. Department of State, Diplomatic Security Service, and have been employed by the Department of State since September 2011. I am currently assigned to HSI's Document and Benefit Fraud Task Force in Baltimore, MD. This task force investigates frauds related to documents, identities, and immigration benefits. I am empowered under 22 U.S.C. § 2709 to obtain and serve federal arrest and search warrants.

Background on Abioye

6. **ABIOYE** is a Nigerian citizen who entered the U.S. in 2018 as a visitor. He overstayed his period of admission into the U.S. and is now present in the U.S. as a visa overstay, although he has a pending petition to adjust his status based on a 2019 marriage to a U.S. citizen. Until November 2019, it appeared **ABIOYE** was residing at an address in Randallstown, MD, but he now has moved to Owings Mills, MD.

7. Your affiant reviewed **ABIOYE**'s visa application and adjudication on file with the U.S. Department of State. Your affiant found that **ABIOYE** was interviewed in January 2018 with a woman named Oluwaseun Sokeye. Their visa applications state they were in a civil



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union/domestic partnership and the adjudicating officer made a note that they were engaged. As noted above, **ABIOYE** caused paperwork to be filed with the government to change his immigration status based on a May 2019 marriage to a U.S. citizen (not Sokeye). On multiple occasions following this marriage, your affiant or another agent have observed a man resembling **ABIOYE** driving a vehicle registered to Sokeye. As of October 2019, **ABIOYE** and Sokeye had the same address on their driver's licenses: 5 Liberty Place, Apt 10, Windsor Mill, MD. **ABIOYE's** wife, the U.S. Citizen, has a Washington, D.C. identification card and appears to live in D.C. as your affiant has been unable to find any Maryland identification document issued to her.

## **II. Probable Cause**

8. Your affiant and other federal agents have evidence that in 2019, multiple individuals, including but not limited to **ABIOYE**, opened numerous bank accounts using either a fake name or the name of a recently formed limited liability company (LLC). The LLCs that law enforcement has focused on often had a fake person listed as a registered agent or authorized representative. Many accounts also were opened using fraudulent United Kingdom passports with alias identities.

9. After the bank accounts were opened, unknown and unidentified individuals<sup>1</sup> convinced victim companies and individuals across the United States to send funds via check, wire, and/or ACH transfer based on fraudulent misrepresentations. The individual(s) who deceived the victims into sending money have employed a variety of fraudulent techniques,

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<sup>1</sup> Based on the investigation and evidence reviewed to date, your affiant has no evidence to suggest that **ABIOYE** or any others identified thus far were the fraudster directly involved in deceiving the victims.



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including but not limited to: (a) a similar sounding email address in which the sender pretended to be an employee of the victim company directing another employee to send money from the company's account; (b) a faked email – supposedly from a victim company's vendor – providing instructions about where to send the payment of a business expense/debt; (c) text messages sent to an individual claiming that the victim had inherited money and asking the victim to pay a processing fee; and (d) an email and text messages sent to a victim individual providing false information about where to send the victim's real estate closing payment. Agents have not interviewed all of the victims – at times your affiant and other federal agents have relied upon bank records, reports by other members of law enforcement, and/or reports by victims to the FBI's Internet Crimes Complaint Center<sup>2</sup> ("IC3") to determine that the money sent by the victim was unauthorized/fraudulent.

10. The victims unknowingly sent their money to accounts used by individuals currently under investigation, including **ABIOYE** as well as a co-conspirator identified herein as Person A. Based on the evidence presented in this affidavit, **ABIOYE** and others played a critical role in the overall conspiracy by opening bank accounts into which the fraudulently obtained funds were initially deposited and/or accounts into which the fraudulently obtained money was moved.

11. Based on the information presented herein, your affiant submits that there is probable cause to believe that **ABIOYE** used the alias Andrew Ali and the LLC Geotric Global LLC ("Geotric") to access fraudulently obtained funds. Similarly, your affiant has probable

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<sup>2</sup> The IC3 is run by the Federal Bureau of Investigation. Complaints are submitted online with an attestation that the information is true and accurate to the best of the submitter's knowledge with a warning regarding false information and 18 U.S.C. § 1001.



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cause to believe that Person A used the names Kenneth Boulan and David Bucha and the LLCs Bouken Services ("Bouken") and Buchaz Crystal LLC ("Buchaz").

Andrew ALI / Geotric Global LLC

12. Maryland state records show that Geotric Global LLC ("Geotric") was created on March 25, 2019. Andrew Ali is the listed resident agent at 7203 Bogley Road, Unit 303, Windsor Mill, MD 21244.

13. Investigators located bank accounts for Geotric at four banks: Bank of America, JPMorgan Chase, Santander, and Wells Fargo. Andrew Ali is the registered account holder on the signature cards for all four accounts.


14. At Santander Bank, the Geotric account ended in 1107 ("SB 1107"). The Santander Bank records for SB 1107 included an image of a United Kingdom of Great Britain and Northern Ireland ("UK"<sup>3</sup>) passport purportedly issued to Andrew Ali and bearing passport number 523865740. An investigator working at the U.S. Embassy in London verified that no UK passport had been issued to Andrew Ali with the date of birth listed on the passport. The number on the passport was issued to a different identity.

15. Your affiant included a copy of the image below from the passport along with **ABIOYE's** Maryland driver's license photograph.<sup>4</sup> To your affiant, the outline of the person depicted on the passport appears similar to **ABIOYE**. Your affiant also notes later in this affidavit multiple instances in which an individual resembling **ABIOYE** provided what based on

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<sup>3</sup> Some banks reference a passport as "GB." Herein those are also referred to as "UK."

<sup>4</sup> Your affiant is aware that **ABIOYE** has a newer driver's license photograph, but I have used this photograph throughout the affidavit because in the new license photograph **ABIOYE** is not wearing eyeglasses and the glasses are distinctive and seen in bank surveillance images.

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your affiant's experience<sup>5</sup> resembles a UK passport to bank tellers. Based on bank tellers presumably being able to view the image on the passport and the person standing before them, your affiant suspects that the image resembles **ABIOYE**.



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#### Wells Fargo

16. On or about April 1, 2019, a Wells Fargo Account ending in 7022 ("WF 7022") was opened at the Greenspring (Maryland) Branch.<sup>6</sup> Wells Fargo records show that WF 7022 is registered to Geotric at 7203 Bogley Road Unit 303, Windsor Mill, MD. WF 7022 did not contain an image of the Ali passport, but does list UK passport number 523865740 – the same passport number that was used at Santander for SB 1107.

17. On May 30, 2019, WF 7022 received a \$49,250 wire from a business in Atlanta, (hereinafter "Business QY"). Your affiant has interviewed a representative of Business QY, which also filed a complaint with the Atlanta Police. Business QY was fooled by a similar

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<sup>5</sup> Your affiant previously worked in the consular section at the U.S. Embassy in London and thus encountered UK passports with some regularity and recognizes the cover of the passports.

<sup>6</sup> According to the Wells Fargo website, the Greenspring Branch is located at 2847 Smith Avenue, Baltimore, MD. Based on your affiant's review of a map on the Baltimore City website, it appears to your affiant that this address is in Baltimore County.

*MM*

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sounding email address, fraudulently inducing Business QY into sending a vendor payment to an incorrect bank account.

18. Also on May 30, 2019, \$9,800 was withdrawn from WF 7022. Based on Wells Fargo surveillance images showing a man resembling **ABIOYE**, your affiant submits there is probable cause to believe that **ABIOYE** withdrew \$9,800 from WF 7022. This withdrawal occurred at the Greenspring (Maryland) branch. On May 31, 2019, \$9,900 was withdrawn from WF 7022 and a cashier's check payable to Buchaz Crystal LLC<sup>7</sup> for \$24,625.20 was purchased from WF 7022. Based on Wells Fargo surveillance images showing a man resembling **ABIOYE**, your affiant submits there is probable cause to believe that **ABIOYE** conducted these transactions.<sup>8</sup> Your affiant has listed below (from left to right) a known image of **ABIOYE** (#1), a Wells Fargo surveillance image from May 30, 2019 (#2), and a Wells Fargo surveillance image<sup>9</sup> from May 31, 2019 (#3). Your affiant submits that this is strong evidence that **ABIOYE** conducted these transactions.

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<sup>7</sup> Your affiant is familiar with Buchaz Crystal (a New Jersey LLC) and believes that it was opened for the purpose of engaging in fraud by another member of the conspiracy, Person A. Your affiant has evidence that a fake identity and fraudulent passport were used in opening at least one bank account for Buchaz Crystal. Your affiant also obtained toll records for a phone number associated with **ABIOYE** (443-431-9092) and found tolls with 862-872-8946, a number listed for Person A on immigration paperwork. These tolls were from July 5 to September 10, 2019.

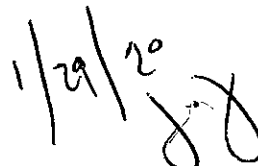
<sup>8</sup> Your affiant requested surveillance footage of both the check purchase and the cash withdrawal on May 31, 2019. Wells Fargo provided images from what appears to be one visit to the bank, however they did not label the transaction. Your affiant assumes that both the check purchase and cash withdrawal were conducted at the same time.

<sup>9</sup> Throughout this affidavit, your affiant includes a number of images from either bank video surveillance or bank photo surveillance. In all instances, the images included here have been cropped from the surveillance provided by the bank.

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19. On June 11, 2019, WF 7022 received a transfer in excess of \$300,000 from a company in California (hereinafter "Business QI"). Your affiant reviewed a complaint filed by Business QI with the IC3, which stated that Business QI incorrectly sent funds after receiving what it thought was a genuine email from a vendor. Business QI later learned the vendor email was fraudulent.

20. On June 11, 2019, according to Wells Fargo records and surveillance images that your affiant has reviewed, a person resembling **ABIOYE** purchased multiple checks using funds from WF 7022. One cashier's check was made payable to "Buc haz [sic] Crystal LLC" for \$96,300.12 and another was payable to Bouken Services LLC<sup>10</sup> for \$89,700.20. Both were purchased at the Greenspring branch. A comparison of **ABIOYE**'s known facial image from his

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<sup>10</sup> Your affiant is familiar with Bouken Services, a New Jersey registered LLC, and believes that it was opened for the purpose of engaging in fraud by another member of the conspiracy. Your affiant has evidence that a fake identity and fraudulent passport were used in opening at least one bank account for Bouken Services. Your affiant also obtained toll records for a phone number associated with **ABIOYE** (443-431-9092) and found more than 40 tolls with 862-872-8946, a number listed for Peron A on U.S. immigration paperwork. A toll may include a call, portion of a call, an attempted call, or SMS/MMS message. These tolls were from July 5 to September 10, 2019.

A handwritten signature in black ink, appearing to be "DMY".

Handwritten text in black ink, showing the date "1/29/20" and a signature or initials.



Maryland driver's license (#1) and the WF 7022 surveillance images from June 11, 2019 is shown below (#2 and #3)<sup>11</sup>:



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Bank of America

21. A Bank of America account in the name of Geotric was opened on April 2, 2019. The last four digits of the account are 8006 ("BOA 8006"). The account was opened at the Garrison Forest financial center. The Bank of America website lists the address as 10315 Reisterstown Road, Owings Mills, MD.

22. On April 15, 2019, BOA 8006 received a \$51,800 wire from a person with the initials R.D. Your affiant obtained an incident report from the Bay County Sheriff's Office in Florida. The reporting officer spoke to R.D. who told the officer that he received a message that he was the beneficiary in a will and was entitled to \$4 million. R.D. was told he needed to pay a processing fee. R.D. said that he was sent a check for \$62,712, which he deposited. R.D. was subsequently instructed to wire \$51,800 to Geotric's BOA 8006, which he did. A bank employee

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<sup>11</sup> WF 7022 records show that the checks were purchased about 10:11 am and 11:55 am so your affiant includes a photo from both of those times.

A handwritten signature in black ink, appearing to be "DM".

Handwritten text in black ink, showing the date "1/29/20" and initials "JH".

told the reporting officer that she contacted the bank on the \$62,712 check and was told it was fraudulent.<sup>12</sup>

23. On April 15 and April 16, 2019, more than \$38,000 was withdrawn or transferred from BOA 8006. This included three cash withdrawals totaling \$10,200 and a \$28,000 wire to an account at Citi Bank, which is the corresponding bank account for the United Bank of Africa, Nigeria. Bank of America provided surveillance images from April 15 and 16, 2019. The man conducting the transactions strongly resembles **ABIOYE**. A comparison of **ABIOYE**'s known image (#1) and Bank of America surveillance from April 15 and April 16, 2019 (#2, #3, and #4) is presented below.



24. In June 2019, BOA 8006 received three wires from a company in Florida (hereinafter "Company EA"). On June 7, 2019, BOA 8006 received a \$50,000 wire from Company EA. On June 10, 2019, BOA 8006 received a wire for \$17,398 from Company EA. On June 11, 2019, BOA 8006 received another wire from Company EA, this time for \$46,287. Your affiant spoke to a representative of Company EA and obtained records from Company EA and Company EA's bank. From them, your affiant learned that Company EA was the victim of a

<sup>12</sup> R.D. also told the officer that he sent money using his account at another bank, but he did not want to report the loss of that money.

fraud in which an email address closely resembling a correct email address was used to direct another Company EA employee to initiate these wire transfers. Company EA's bank records also show that on June 13, 2019 there was a failed \$49,982.21 wire from Company EA's account to an account for Bouken Services LLC -- one of the New Jersey LLCs to which checks from Geotric were made out.

25. From June 7 to June 13, 2019, over \$100,000 was withdrawn or transferred out of BOA 8006. A number of the transactions occurred in Baltimore County. Your affiant obtained surveillance images/videos from Bank of America for a number of these transactions and lists some of the larger transactions here.

Date	Transaction type	Amount	Surveillance
June 7, 2019	Cash withdrawal	\$9,500 <sup>13</sup>	Yes
June 7, 2019	Cashier's check to Buchaz Crystal	\$24,313.15 <sup>13</sup>	Yes
June 10, 2019	Cash withdrawal	\$9,600	Not provided
June 10, 2019	Wire to Insurance Auto Auctions	\$8,650	Not provided
June 10, 2019	Cash withdrawal	\$5,300	Yes
June 12, 2019	Wire to Insurance Auto Auctions	\$23,057.30	Not provided
June 12, 2019	Cash withdrawal	\$9,000 <sup>13</sup>	Yes
June 13, 2019	Cash withdrawal	\$9,600	Yes <sup>14</sup>

<sup>13</sup> During this transaction, the man who resembles **ABIOYE** gave the teller a document that based on your affiant's experience resembles a UK passport.

<sup>14</sup> Your affiant reviewed surveillance provided by both the legal order processing department as well as from an investigator at Bank of America related to June 13, 2019. The legal order processing provided surveillance for this transaction that does not appear to be **ABIOYE**; however, the image provided from the investigator does resemble **ABIOYE**. Your affiant noted that the surveillance provided was from the same date at approximately the same time (11:53 a.m. and 11:54 a.m.) but different bank branches. Your affiant suspects that legal

24. Your affiant includes below a known picture of **ABIOYE** from his Maryland driver's license on the left (#1) followed by photos from Bank of America surveillance on June 7 (#2), June 10 (#3), June 12 (#4), and June 13, 2019 (#5).



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25. On June 19, 2019, BOA 8006 received a \$20,850 wire from a woman with the initials S.M. Your affiant reviewed an IC3 complaint filed by S.M. S.M. wrote that while “stationed” in Germany (presumably as a part of the military or U.S. government given her reference to being stationed), S.M. was purchasing a house in anticipation of moving back to the U.S. An email account mirroring her title company's email address was used to request additional closing costs, and fraudulently deceive her into sending funds.

26. On June 19 and June 20, 2019, over \$20,000 was withdrawn from BOA 8006. Among the withdrawals was a \$9,500 teller cash withdrawal on June 19, 2019 and a \$9,300 teller cash withdrawal on June 20, 2019. Your affiant reviewed images from Bank of America for these dates and found that both showed a man resembling **ABIOYE**. The known image of

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order processing provided surveillance footage from the wrong branch location. The image resembling **ABIOYE** is provided herein.

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**ABIOYE** is shown below on the left (#1), compared with images from Bank of America on June 19<sup>th</sup> (#2) and June 20<sup>th</sup> (#3).



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Santander Bank

27. On May 30, 2019, a cashier's check for \$89,450 was deposited into the Geotric account at Santander ("SB 1107"). The check came from a church in Nevada. Based on records your affiant obtained from the church's bank, your affiant knows that the bank received an email requesting the \$89,450 cashier's check from the church's bank account. The email purportedly came from an employee of the church, but the church employee's email had been compromised. To verify the request, the bank employee called the phone number listed on the check request and not the number for the church in the bank's records. As a result, the bank employee spoke with a fraudster who authorized sending the check.

28. On June 3 and June 4, 2019, more than \$89,000 was removed from the account via purchases, wires, checks, and withdrawals.

29. On June 3, 2019, \$45,500 was wired to the United Bank of Africa, Nigeria corresponding bank account at Citi Bank. On June 4, 2019, another \$19,000 was wired to the United Bank of Africa, Nigeria corresponding bank account at Citi Bank.

30. On June 3, 2019, \$9,800 was withdrawn in cash at a branch in Hanover, PA.

A handwritten signature in black ink, appearing to be 'MM' or similar initials.

Handwritten text in black ink that reads '1/29/20' followed by a signature that appears to be 'J.F.'.

31. On June 4, 2019, \$6,000 was withdrawn in cash and a \$5,000 cashier's check made payable to Geotric Global LLC was purchased in Hanover, PA. Also, on June 4, 2019, \$1,000 was withdrawn via an ATM transaction in Hanover, PA.

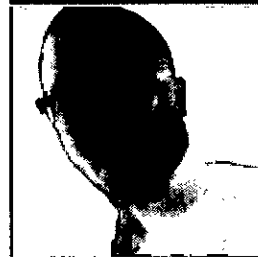
32. Santander only provided surveillance of the June 4, 2019 ATM transaction. Your affiant compared the image to a known image of **ABIOYE** and believes the person conducting the transaction resembles **ABIOYE**. Your affiant included below a known image of **ABIOYE** on the left and two images from the ATM surveillance (#2 and #3).



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33. In the June 4<sup>th</sup> video, the man resembling **ABIOYE** exited a vehicle your affiant recognizes as a white Volkswagen sedan. **ABIOYE** had a white Volkswagen Jetta registered to him and your affiant has observed **ABIOYE** driving a white Volkswagen CC (sedan).

34. Your affiant also obtained the Wells Fargo surveillance image from June 4, 2019, the same day, when \$5,000 in checks were deposited into WF 7022 (Geotric). Your affiant suspects this was the \$5,000 check from SB 1107, but Wells Fargo did not produce the deposited check(s). The man conducting the deposit resembles **ABIOYE**. A known image of **ABIOYE** is included below (#1) along with the Wells Fargo surveillance image from June 4, 2019 (#2).

A handwritten signature in black ink, appearing to be 'M' followed by a stylized flourish.

Handwritten text in black ink, appearing to be '1/29/20' followed by a stylized signature or initials.



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Chase Bank

35. There were two accounts opened in the name of Geotric at Chase Bank. An account ending 3222 was opened on April 18, 2019 ("CB 3222") and an account ending 3972 was opened on May 22, 2019 ("CB 3972")

36. On May 18, 2019,<sup>15</sup> a check for \$35,000 was deposited into the Geotric account, CB 3222. The remitter on the check was B.D. Your affiant obtained a police report from the Salt River Police Department in Arizona. According to the report, B.D.'s year of birth is 1947. The reporting officer met with B.D. and her daughter. The daughter told the officer that B.D. accepted approximately \$74,000 from someone B.D. knew as Jerry Smith. B.D. then distributed the money in various ways including cashier's checks. The daughter further advised that they had spoken to a Wells Fargo employee, who advised that the \$74,000 was stolen. B.D. told the officer that she met a man who she knew as Jerry Smith on Facebook, and that they were in a romantic relationship. Jerry Smith told B.D. that he was from the U.S., but was currently working in Nigeria. B.D. provided the officer with a copy of the deposit receipt into the Chase

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<sup>15</sup> The bank statement says May 20, 2019 but the deposit slip says May 18, 2019.

A handwritten signature in black ink, appearing to be "DM".

Handwritten text in black ink, including the date "1/29/20" and initials "JD".

account. Your affiant believes that B.D. was the victim of a romance scam in which her account was used to receive and disburse fraudulent funds.

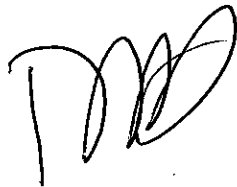
37. On May 22, 2019, \$9,650 was withdrawn from CB 3222. Surveillance provided by Chase for May 22, 2019 resembles **ABIOYE**.

38. On May 22, 2019, \$24,935.54 was transferred from CB 3222 to CB 3972.

39. On May 23, 2019, \$1,000 was withdrawn via ATM and \$9,850 via teller from CB 3972. In the teller transaction, your affiant noted that the teller gave back a document that your affiant believes based on experience resembled a UK passport. Chase teller and ATM surveillance from May 23, 2019 resembled **ABIOYE**.

40. On May 24, 2019, \$1,000 was withdrawn via ATM and \$9,850 via teller from CB 3972. May 24, 2019 ATM surveillance appears to be **ABIOYE**. The only surveillance provided from the teller withdrawal is from some distance. The person in the image is wearing a shirt and hat that look very similar to the clothing visible in the ATM surveillance.

41. Your affiant pasted below from left to right, a known photo from **ABIOYE**'s driver's license (#1), a surveillance image from May 22, 2019 (#2), a surveillance image from the May 23, 2019 ATM transaction (#3), a surveillance image from the May 23, 2019 teller transaction (#4), and a surveillance image from the May 24, 2019 ATM transaction (#5). Your affiant submits that there is ample probable cause to believe that **ABIOYE** is depicted in all five images (#1-#5).

A handwritten signature in black ink, appearing to be 'MD' or similar, located below the text of paragraph 41.A handwritten signature and date '1/29/20' in black ink, located at the bottom right of the page.





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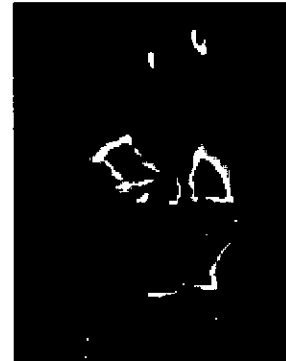
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42. Your affiant further submits that the surveillance image from the May 24, 2019 teller transaction (#6) is likely **ABIOYE** given the similar shirt and hat in image #5 and image #6 below:



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43. On July 9, 2019, CB 3972 received a wire of \$97,850 from a woman with the initials M.L. who lives in Texas. Your affiant reviewed a complaint filed by M.L. with the IC3. In the complaint, M.L. explained that in the process of closing on a house, she sent the money as a result of an email purporting to be from her title company and text messages with the suspected fraudster.

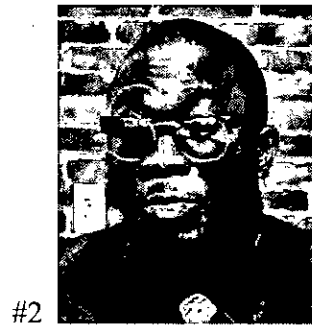
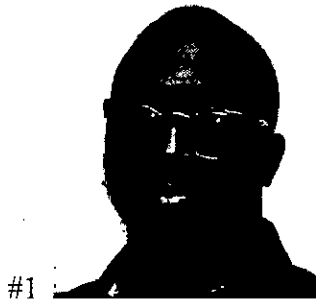
44. On July 9, 2019, \$37,000 from CB 3972 was wired to the Citi corresponding bank account for the United Bank of Africa, Nigeria.

A handwritten signature in black ink, consisting of stylized letters.

A handwritten date "1/29/20" and a signature in black ink.

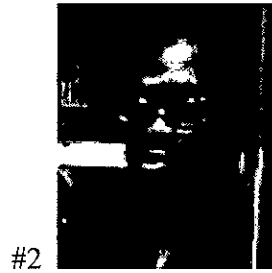
45. On July 9, 2019, \$57,220 was withdrawn from CB 3972. \$48,220 of this was a cashier's check to Bouken Services LLC. Your affiant is unable to determine the form of the withdrawal of the other \$9,000. Your affiant obtained Chase surveillance video from July 9, 2019. The man shown resembles **ABIOYE**. In addition, in the video the teller can be seen handing a small item back to the man resembling **ABIOYE**. Based on your affiant's experience, the item resembles a UK passport and is thus likely the Andrew Ali UK passport used to open multiple Geotric accounts.

46. Your affiant includes below a known picture of **ABIOYE** from his Maryland driver's license on the left (#1) and an image (#2) from Chase surveillance for July 9, 2019 on the right.



47. Your affiant also obtained video from July 9, 2019 of the deposit of the \$48,220 check to Bouken Services purchased from CB 3972. The check was deposited at a Capital One branch in Reisterstown. Your affiant included a known picture of **ABIOYE** below along with a July 9, 2019 surveillance image from Capital One. Your affiant submits the individual in the Capital One footage resembles **ABIOYE**.





### III. CONCLUSION

48. This affidavit describes more than \$500,000 that was deposited into bank accounts based on false promises, representations, or statements. The bank accounts that received the funds (either directly or indirectly) were used by **ABIOYE** and Person A. Shortly after these funds were deposited into Geotric's bank accounts, significant sums were removed from the accounts -- in many examples by a person closely resembling **ABIOYE**. Based the bank records showing the fake UK passport and bank surveillance of an item resembling a UK passport, your affiant submits that there is probable cause to believe that **ABIOYE** used the fake Ali passport at Chase, Wells Fargo, Bank of America, and Santander banks.

49. Moreover, based on the surveillance, your affiant submits there is probable cause to believe **ABIOYE** caused financial transactions in such accounts. Your affiant submits that there is probable cause to believe that when **ABIOYE** conducted transactions in the accounts opened using the entities and/or fake alias, **ABIOYE** was causing a wire fraud on the banks and on the individuals whose funds were deposited into those accounts through fraud and deceit. Finally, your affiant submits that there is probable cause to believe that **ABIOYE** conspired with Person A. Your affiant submits that there is probable cause that **ABIOYE**'s actions were coordinated with Person A when **ABIOYE** obtained checks payable to the New Jersey LLCs Bouken and Buchaz using the funds obtained via fraud from victims in multiple states.

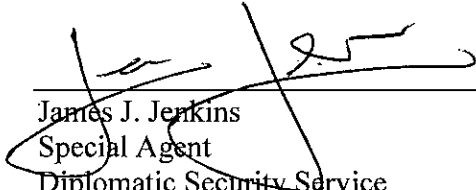
A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes.

Handwritten text in black ink, showing the date "1/29/20" and the initials "J.D." below it.

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50. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that **ABIOYE** conspired to commit wire fraud, in violation of 18 U.S.C. § 1349.

Respectfully submitted,

  
\_\_\_\_\_  
James J. Jenkins  
Special Agent  
Diplomatic Security Service  
U.S. Department of State

Subscribed and sworn to before me on January 29, 2020.

  
\_\_\_\_\_  
**THOMAS M. DIGIROLAMO**  
**UNITED STATES MAGISTRATE JUDGE**

1/29/20  
J.J.